

EXHIBIT H

From: Daluz, Tobey Marie
Sent: Friday, November 10, 2023 11:54 AM
To: Steve Hann
Subject: RE: Chester Bankruptcy Information Request for SACC

Thank you, Steve. Based on your voicemail, it appears that you are not in a position to confirm that SACC will produce the items requested by a date certain, we have no option other than to proceed with the filing of a 2004 motion. My preference is to avoid unnecessary litigation but we are in a position of having to move the bankruptcy case forward in a more expeditious fashion. If we file the motion, it can always be resolved consensually or withdrawn if and when we receive the documents.

Feel free to contact me if you have any questions.

Tobey Marie Daluz
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From: Steve Hann <shann@hrmml.com>
Sent: Friday, November 10, 2023 9:48 AM
To: Daluz, Tobey Marie <DaluzT@ballardspahr.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

⚠ EXTERNAL

Tobey,

I just left you a voicemail message.

Steve



Steven A. Hann, Esquire
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From: Daluz, Tobey Marie <DaluzT@ballardspahr.com>
Sent: Thursday, November 9, 2023 5:28 PM
To: Steve Hann <shann@hrmml.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

Steve –

Pursuant to Local Rule 2004-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Pennsylvania, this email shall serve as an invitation to meet and confer regarding the request for documents originally directed to the Stormwater Authority of the City of Chester on June 16, 2023. While we acknowledge receipt of responsive documents in June and August 2023, we have received no response to our follow-up request dated October 27, 2023. As previously noted, the vast majority of the items identified in the attached supplemental request relate back to the original request. If we do not hear from you by the close of business tomorrow, we will conclude that SACC has no intention to provide the documents on a consensual basis.

The City reserves its right to file a Rule 2004 motion with the Bankruptcy Court to obtain the documents.

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From: Daluz, Tobey Marie
Sent: Monday, November 6, 2023 10:08 AM
To: 'SHann@HRMML.com' <SHann@HRMML.com>
Subject: RE: Chester Bankruptcy Information Request for SACC

[Steve, just following up on this email.](#)

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From: Daluz, Tobey Marie
Sent: Friday, October 27, 2023 6:04 PM
To: 'SHann@HRMML.com' <SHann@HRMML.com>
Subject: Chester Bankruptcy Information Request for SACC

Steve:

Thank you for SACC's responses to the information request that was originally transmitted in June of this year. After reviewing the documents provided, we have some follow-up requests and inquiries.

Attached is a list of items that are still needed by the City in connection with the bankruptcy and our goal to accomplish a viable plan of adjustment for the City and its residents. Most of the items were included in the original request. If responsive documents don't exist in the form that was requested, it would be helpful if SACC could note that. Also, the attached list includes a couple of requests that arise from our review of the original information produced. The list also explains the reason for the follow-up request.

I have attached the original communication for your convenience. Let me know if you have any questions or you would like to discuss.

Tobey Marie Daluz
She/Her/Hers

Ballard Spahr
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DIVERSITY
EQUITY + INCLUSION

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